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42 **UNITED STATES DISTRICT COURT**
43 **NORTHERN DISTRICT OF CALIFORNIA**
44 **SAN FRANCISCO DIVISION**

45 ANIBAL RODRIGUEZ, et al. individually and on
46 behalf of all others similarly situated,

47 Plaintiff,

48 vs.

49 GOOGLE LLC,

50 Defendant.

51 Case No. 3:20-CV-04688-RS

52 **JOINT STIPULATION AND**
53 **[PROPOSED] ORDER FOR OMNIBUS**
54 **MOTION TO SEAL SUMMARY**
55 **JUDGMENT BRIEFING**

56 Judge: Hon. Richard Seeborg
57 Courtroom: 3, 17th Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”)
2 and Defendant Google LLC (“Google”), collectively, the “Parties” submit this joint stipulation.

3 WHEREAS, Google moved for summary judgment on March 28, 2024 (Dkts. 381, 384),
4 and

5 WHEREAS, Plaintiffs opposed summary judgment on May 2, 2024 (Dkt. 398), and

6 WHEREAS, pursuant to the Court’s April 8, 2024 Order (Dkt. 386), Google’s reply in
7 further support of summary judgment will be filed on or before May 30, 2024, and

8 WHEREAS, pursuant to Civil Local Rule 79-5, Google would be required to file statements
9 supporting maintaining Google’s confidential material filed in connection with Plaintiffs’
10 opposition and Google’s reply brief no later than May 9, 2024 and May 30, 2024 respectively, and

11 WHEREAS, Google represents that its reply brief is likely to rely on some of the same
12 confidential material attached to Plaintiffs’ opposition brief, and

13 WHEREAS, Google contends that it would be most efficient to present evidentiary materials
14 in support for sealing all materials as part of one omnibus motion, and

15 WHEREAS, Google also represents that it would benefit from additional time to secure the
16 appropriate declarants and evidentiary support for maintaining the confidential material under seal,
17 and

18 WHEREAS, the parties stipulated to, and the Court ordered, a substantially similar proposal
19 in connection with class certification briefing (Dkts. 320, 321), and

20 WHEREAS, Google proposed setting a June 28, 2024 deadline to file this omnibus motion,
21 and

22 WHEREAS, Plaintiffs have no objection to Google’s proposal,

23 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the

24 Parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that the Parties shall
25 file an omnibus motion to seal all material filed under seal along with the Parties’ summary
26 judgment briefing by June 28, 2024. The omnibus motion will otherwise follow the procedures
27 outlined in Civil Local Rule 79-5(b)-(f). It will include not only an administrative motion to seal;

1 evidentiary support; a proposed order; proposed redacted versions of documents sought to be
2 maintained under seal; and unredacted, under-seal versions of these documents, highlighting the
3 portions for which sealing is sought.

4 A Proposed Order is submitted concurrently herewith.

5 IT IS SO STIPULATED.

6 DATED: May 8, 2024

WILLKIE FARR & GALLAGHER, LLP

7 By: /s/ Benedict Y. Hur
8 Benedict Y. Hur

9 *Attorneys for Defendant Google LLC*

10
11 DATED: May 8, 2024

By: /s/ Mark C. Mao

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26 *Attorneys for Plaintiff*

27 **FILER'S ATTESTATION**

28 Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this
29 filing is submitted, concur in the filing's content and have authorized this filing.

30 DATED: May 8, 2024

31 WILLKIE, FARR & GALLAGHER LLP

32 /s/ Benedict Y. Hur
33 Benedict Y. Hur

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55 Judge: Hon. Richard Seeborg
56 Courtroom: 3, 17th Floor

1 Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the Parties' omnibus
2 motion to seal material related to the summary judgment briefing be due on June 28, 2024.
3

4 **IT IS SO ORDERED.**

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6 Dated: _____
7

8 Honorable Richard Seeborg
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